

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA §
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V. CAUSE NO. SA-23-CR-238 JKP
ASHLEY TANYA GARCIA

**DEFENDANT'S UNOPPOSED MOTION TO
ENLARGE TRAVEL RESTRICTIONS**

TO THE HONORABLE RICHARD B. FARRER, MAGISTRATE JUDGE FOR THE UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF TEXAS:

Defendant Ashley Tanya Garcia, by and through her undersigned attorney, files this Motion To Enlarge Travel Restrictions, and shows this Honorable Court as follows.

I

Defendant was released on bond on April 5, 2023. Ms. Garcia has been in compliance while out on bond.

II

Ms. Garcia wants to travel to Houston, Texas. She will be traveling by personal vehicle. She requests permission to leave on December 29, 2023, and return on the same day arriving in San Antonio no later than 10:00 pm.

III

Counsel for the government Assistant United States Attorney Bettina J. Richardson and
United States Pretrial Services Office do not oppose this request for travel.

IV

FOR THESE REASONS, Ms. Garcia prays this Honorable Court will enlarge her travel restrictions consistent with this motion.

Respectfully submitted.

MAUREEN SCOTT FRANCO
Federal Public Defender

/s/ MARINA-THAIS DOUENAT
Assistant Federal Public Defender
Western District of Texas
300 Convent Street, Suite 2300
San Antonio, Texas 78205
Tel: (210) 472-6700
Fax: (210) 472-4454
State Bar Number: 00798310

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of December 2023, I electronically filed the foregoing Defendant's Unopposed Motion to Enlarge Travel Restrictions with the Clerk of the Court using the CM/ECF system which will give notification of such filing to the following:

Bettina J. Richardson
Assistant United States Attorney
601 N. W. Loop 410, Suite 600
San Antonio, Texas 78216

And a courtesy copy has been emailed to:

Natasha Kopsie
United States Pretrial Officer

/s/ MARINA-THAIS DOUENAT
Attorney for Defendant

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ORDER

On this date came on to be considered Defendant's Unopposed Motion To Enlarge Travel Restrictions, and the Court having considered the same, is of the opinion said Motion should be GRANTED.

It is therefore ORDERED that Defendant shall be allowed to travel to Houston, Texas, leaving December 29, 2023, and returning on the same day, arriving home no later than 10:00 p.m.

The defendant shall comply with all other usual and normal conditions of pretrial release.

ORDERED on this the _____ day of December 2023.

RICHARD B. FARRER
United States Magistrate Judge